UNITED STATES DISTRICT COURT SOUTHERN DISTRICT OF FLORIDA MIAMI DIVISION

Case No. 24-cv-20543-KMW

JUAN MENDEZ,
Plaintiff,
v.
ALPHA & OMEGA CALIBRATION SERVICES LLC and LIZ Y. LAGO,
Defendants.

SCHEDULE JOINTLY PROPOSED BY THE PARTIES

THIS MATTER is set for trial for the two-week trial period commencing September 8,

2025. The Parties propose to adhere to the following schedule:

June 3, 2024	The Parties shall furnish their initial disclosures pursuant to Fed. R. Civ. P. 26. The Parties are under a continuing obligation to furnish supplements within ten (10) days of receipt or other notice of new or revised information.
	The Parties shall file motions to amend pleadings or join Parties.
July 1, 2024	Plaintiff(s) shall disclose experts, expert witness summaries and reports, as required by Federal Rule of Civil Procedure 26(a)(2).
September 27, 2024	Defendant(s) shall disclose experts, expert witness summaries and reports, as required by Federal Rule of Civil Procedure 26(a)(2).
January 31, 2025	The Parties shall exchange rebuttal expert witness summaries and reports, as required by Fed. R. Civ. P. 26(a)(2).
January 24, 2025	The Parties shall complete all discovery, including expert discovery.
January 24, 2025	The Parties shall complete mediation and file a mediation report with the Court.

April 11, 2025 The Parties shall file all dispositive pre-trial motions and

memoranda of law. The Parties shall also file any motions to strike or exclude expert testimony, whether based on Fed. R. Evid. 702 and Daubert v. Merrell Dow Pharmaceuticals, Inc., 509 U.S. 579

(1993), or any another basis.

July 31, 2025 The Parties shall each file one motion in limine. All motions in

limine must be filed at least six (6) weeks before Calendar Call.

August 15, 2025 The Parties shall file their joint pretrial stipulation, witness lists, and

exhibit lists in accordance with Local Rule 16.1(d) and (e). The Parties shall also file proposed jury instructions and a proposed verdict form, or statement of fact and conclusions of law (for non-

jury trials)

August 29, 2025 The Parties shall submit their deposition designations

By:

ATTORNEYS FOR PLAINTIFF:

THORNETS FOR FLAINTIFF.

/s/ Patrick Brooks LaRou

Brian H. Pollock, Esq. Florida Bar No. 174742 Patrick Brooks LaRou, Esq. Florida Bar No. 1039018

FAIRLAW FIRM

135 San Lorenzo Avenue, Suite 770

Coral Gables, Florida 33146 Telephone: 305-230-4884 Facsimile: 305-230-4844 brian@fairlawattorney.com

brooks@fairlawattorney.com

Dated: May 2, 2024

ATTORNEY FOR DEFENDANTS:

/s/ Ena T. Diaz

Ena T. Diaz

FL Bar No. 0090999 Ford Harrison LLP

One S.E. Third Ave., Suite 2130

Miami, FL 33131

Telephone: (305) 808-2113 Facsimile: (305) 808-2101 ediaz@fordharrison.com

Dated: May 2, 2024